

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

IN RE:	:	CASE NO: 18-57452-SMS
	:	CHAPTER: 13
	:	
KEITH ANTONIO NORWOOD	:	
Debtor	:	

FRANKLIN CREDIT MANAGEMENT	:	
CORPORATION AS SERVICER FOR	:	
BOSCO CREDIT VI TRUST SERIES	:	
2012-1,	:	
Movant,	:	
	:	CONTESTED MATTER
vs.	:	
	:	
KEITH ANTONIO NORWOOD	:	
MARY IDA TOWNSON, Trustee	:	
Respondents.	:	

OBJECTION TO CONFIRMATION

COMES NOW, Franklin Credit Management Corporation as servicer for BOSCO Credit VI Trust Series 2012-1, its successors or assigns (hereinafter referred to as "Movant"), and shows the Court that for reasons set out below, Movant objects to the confirmation of the Debtor's Plan:

1.

Movant will timely file a Proof of Claim, on or before the Proof of Claim Bar Date, listing arrearages totaling approximately \$34,243.93 as the loan is due to mature on April 1, 2019, which is during the pendency of the instant case. The Debtor's Plan fails to list Movant and thus fails to provide adequate protection to Movant relative to a property located at 1980 Cutters Mill Way, Lithonia, GA 30058 in violation of U.S.C. § 362. For this reason, Movant objects to confirmation of the Plan in its current form.

WHEREFORE, Franklin Credit Management Corporation as servicer for BOSCO Credit VI Trust Series 2012-1, its successors or assigns, prays that this Court inquire as to the matters raised herein and deny confirmation of the Debtor's Plan, or enter such orders and require such further inquiry as may appear appropriate to the Court.

Dated: 6/7/18

/s/ Lisa F. Caplan

Lisa F. Caplan

GA State Bar No. 001304

Rubin Lublin, LLC

3145 Avalon Ridge Place, Suite 100

Peachtree Corners, GA 30071

(877) 813-0992

lcaplan@rubinlublin.com

Attorney for Creditor

CERTIFICATE OF SERVICE

I, Lisa F. Caplan of Rubin Lublin, LLC certify that on the 7th day of June, 2018, I caused a copy of the Objection to Confirmation to be filed in this proceeding by electronic means and to be served by depositing a copy of the same in the United States Mail in a properly addressed envelope with adequate postage thereon to the said parties as follows:

Keith Antonio Norwood
1980 Cutters Mill Way
Lithonia, GA 30058

Lorena Lee Saedi, Esq.
Saedi Law Group, LLC
Suite 103
3006 Clairmont Road
Atlanta, GA 30329

Mary Ida Townson, Trustee
Chapter 13 Trustee
191 Peachtree Street, NE
Suite 2200
Atlanta, GA 30303

Executed on: 6/7/18
By: /s/ Lisa F. Caplan
Lisa F. Caplan
GA State Bar No. 001304
Rubin Lublin, LLC
3145 Avalon Ridge Place, Suite 100
Peachtree Corners, GA 30071
(877) 813-0992
lcaplan@rubinlublin.com
Attorney for Creditor